

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

v.

SAMUEL SULLIVAN, JR.

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Case No. 21-CR-0460-TDC

**CONSENT MOTION TO EXTEND DEADLINES FOR FILING THE
DEFENDANT'S SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION TO
SUPPRESS AND JOINT STATUS REPORT**

The Defendant, Samuel Sullivan, Jr., by and through his attorney, Michael E. Lawlor and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court continue the deadlines for filing the Defendant's supplemental brief in support of his Motion to Suppress (ECF No. 33) and joint status report. In support of this motion, counsel states the following.

1. By Order of August 18, 2022 (ECF No. 51), Mr. Sullivan is due to file his supplemental brief in support of his Motion to Suppress by October 4, 2022. In accordance with that same Order, the parties are to file a joint status report by October 18, 2022, informing this Court whether either party seeks a hearing on the pending motion and if so, whether, and how many, witnesses will testify at the hearing and the expected length of the hearing. (ECF No. 51 at 3.)

2. Mr. Sullivan respectfully requests a 21-day extension to the above-referenced deadlines.

3. The undersigned is currently in a multi-week kidnapping and murder trial in the United States District Court for the District of Columbia in the matter of *United States v. Darin C. Moore, Jr.*, No. 18-CR-0198-JEB. In that case, the undersigned is the sole counsel for one of four defendants on trial. The trial, which began on September 19, 2022, is scheduled to continue for at least two more weeks.

4. Additionally, Mr. Sullivan's case is complex and the discovery is voluminous. The charges in this case relate to 3 alleged bank robberies, one alleged Hobbs Act robbery, and two alleged attempted Hobbs Act robberies. (Indictment, ECF No. 1.) Mr. Sullivan is also charged in Count Five of the Indictment with a firearm offense that carries a significant mandatory minimum term of imprisonment if convicted.¹ (ECF No. 1 at 5.) The undersigned counsel entered his appearance in this case on July 19, 2022 after prior counsel withdrew. (Entry of Appearance, ECF No. 47.) The undersigned counsel requires additional time to review the discovery in this case.

5. Moreover, Mr. Sullivan was recently moved to Northern Neck Regional Jail in Warsaw, Virginia, a facility that is more than a two-hour drive from

¹ Mr. Sullivan has a prior case in this Court. See *United States v. Sullivan*, TDC-10-223.

the undersigned counsel's office. It has therefore been difficult to schedule in-person meetings to review the case with Mr. Sullivan.

6. Lastly, the parties are engaged in active plea negotiations. Should the parties reach a resolution, counsel will immediately inform this Court in a joint submission.

7. The undersigned counsel has conferred with Assistant United States Attorney G. Michael Morgan, who consents to the relief requested.

8. For these reasons, Mr. Sullivan respectfully requests that this Court extend the current deadlines in this case by 21 days.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, October 3, 2022, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Maryland.

/s/

Michael E. Lawlor